- 2 wells on either side of pipe (10-15 ft deep)
- 50 ft. buffer area
or
- Nested pair (10 ft & 20 ft)
- sample for RCRA metals, sulfates

B-2 6-11 ft mottled clayer silty sand — Piez. B-3 5-6 ft mottled clayer sand

Moore&VanAllen

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Received
FEB 2004
Solid Waste Section

February 11, 2004

deed restrictions?

Mr. Mark Poindexter
Branch Head, Field Operations Branch
Solid Waste Section
North Carolina Department of Environment and Natural Resources
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

(field parameters - pH, temp, Cond, DO, Redox, ferrous Fe (Fe^{2+}))

Low flow = less metal binding abilities & less ability to attenuate UV radiation (block)

Re: ReUse Technology, Inc. Hwy. 301 Swift Creek Project Coal Combustion By-Product Structural Fill Site

COPY

Dear Mr. Poindexter:

I am responding on behalf of ReUse Technology, Inc. ("ReUse") to your letter dated December 18, 2003. ReUse believes that it has previously satisfied the requirements of the Division of Waste Management's April, 2002 NOV (as Amended by the August 19, 2002 NOV correspondence) by (a) diverting the surface water drainage flow from the under-fill pipe and sealing it; (b) by filing and recording a deed and a plat to remove the internal property boundary and to show the location of the CCB structural fill, and (c) by submitting the May, 2003 site investigation of the Swift Creek Project to show the relationship of the under-fill pipe, the ash fill and the water levels.

As the Division is aware, the area east and downgradient of the buffer consists of swamp and wetlands beginning just past the buffer and extending for a distance of more than a mile. There are no residences or other receptors which utilize groundwater resources within a mile downgradient of the site. Municipally supplied water from the City of Rocky Mount is present along Highway 301 and is available to the area of the project.

ReUse understands that the Division nonetheless remains concerned about the potential for groundwater impact from the as-built fill. ReUse does not believe that obtaining groundwater samples within the 50 foot buffer area as requested by the Division will generate any data that are actually relevant to resolving a concern about potential off-site impacts to human health or the environment. Data taken at that distance is effectively data from within the project itself. This point is supported by the USEPA as presented in the Federal Register/Vol. 65, No.99, May 22, 2000, 40CFR Part 261 – Regulatory Determination on Waste from the Combustion of Fossil Fuels; Final Rule.

"we supercede"

> "We do not believe that it would be appropriate to consider an exceedence directly beneath a waste management unit or very close to the waste boundary to be a documented, proven damage case. State regulations typically use a compliance procedure that relies on measurement at a receptor site or in groundwater at a point beyond the waste boundary (e.g., 150 meters)."

Swift Creek = Class C+NSW (secondary recreation & nutrient sensitive waters (no ↑ in nutrients))

(particles flow w/ ↑ [illegible] pH)

With this guidance, ReUse proposes to install a monitoring well in the swamp area at a distance of approximately 130 feet (40 meters) from the project. The monitoring well will be constructed by a certified well driller and will comply with 15A NCAC 2C Standards. This can be accomplished by constructing a temporary roadway as presented in Figure 1. The roadway as planned will have a wetlands impact of 0.082 acres.

After construction of the roadway the monitoring well will be installed using an ATV drilling rig. Split spoon samplers will be driven at 5-foot centers and the samples will be described and recorded by a licensed geologist. The boring will be taken to a depth of approximately thirty feet below the surface of the temporary roadway. The boring will be completed as a Type III monitoring well to insure the integrity of the monitoring well and avoid any potential influence from the surrounding surface water body. Hollow-stem 6.5 inch ID augers will be advanced to a depth of 15 feet. A 4 inch diameter PVC casing will be placed to a depth of 15 feet and the annular space cemented with grout. The next day, the boring will be advanced using a 3-7/8 inch roller cone bit. Rotary drilling will be performed to a depth of 30 feet. The monitoring well will be completed using 2-inch diameter Schedule 40 PVC with a 10 foot section of slotted screen pipe. The well will be completed above ground with protective outer casing and bollards. A schematic of the proposed Type III monitoring well is shown as Figure 2.

30 ft deep
Screen 20-30

After the monitoring well has been properly developed, the well will be purged and a groundwater sample collected. As requested, the groundwater sample will be analyzed for RCRA metals and sulfates. A second sampling event will be scheduled to follow 6 months later. The duration of the sampling will be annual for a minimum additional 4 years and the results will be submitted to the Solid Waste Section following each sampling event.

ReUse is willing to perform the above proposed measures at once in order to resolve the Division's concern with the issue and to close out this matter. We look forward to discussing this matter with you.

Very truly yours,

William A. White

cc: Robert J. Waldrop
Mark A. Casper

Attachments

nested pairs at compliance boundary